

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED
October 23, 2024
athan Ochsner, Clerk of Cou

UNITED STATES OF AMERICA

v.

SALIH ALI MOHAMMED ALHEMOUD

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
Hate Crime
(18 U.S.C. § 249(a)(2))

On or about August 29, 2022, in the Southern District of Texas and within the jurisdiction of the Court, the Defendant,

SALIH ALI MOHAMMED ALHEMOUD,

willfully caused bodily injury to Victim #1 because of Victim #1's actual and perceived sexual orientation and gender identity; and that in connection with this offense, the defendant employed a firearm that had travelled in interstate commerce, and used a channel, facility and instrumentality of interstate commerce. This act included kidnapping.

In violation of 18 U.S.C. § 249(a)(2).

COUNT TWO
Kidnapping
(18 U.S.C. § 1201(a)(1))

On or about August 29, 2022, in the Southern District of Texas and within the jurisdiction of the Court, the Defendant,

SALIH ALI MOHAMMED ALHEMOUD.

did unlawfully and willfully seize, confine, inveigle, and hold Victim #1 for reward and benefit, and in committing and in furtherance of the commission of the offense, used Grindr, a social networking internet application, and a Glock 17, 9-millimeter firearm, serial number BVZZ495, a means, facility, and instrumentality of interstate and foreign commerce.

In violation of 18 U.S.C. § 1201(a)(1).

COUNT THREE

**Brandishing a Firearm During and in Relation to a Crime of Violence
(18 U.S.C. § 924(c)(1)(A))**

On or about August 29, 2022, in the Southern District of Texas and within the jurisdiction of the Court, the Defendant,

SALIH ALI MOHAMMED ALHEMOUD,

did knowingly brandish, carry and use a firearm, that is, a Glock 17, 9-millimeter firearm, serial number BVZZ495, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, a hate crime as charged in Count One of this Indictment, in violation of 18 U.S.C. § 249, and kidnapping as charged in Count Two of this Indictment, in violation of 18 U.S.C. § 1201(a)(1).

In violation of 18 U.S.C. § 924(c)(1)(A).

COUNT FOUR

**Hate Crime
(18 U.S.C. § 249(a)(2))**

On or about September 1, 2022, in the Southern District of Texas and within the jurisdiction of the Court, the Defendant,

SALIH ALI MOHAMMED ALHEMOUD,

willfully caused bodily injury to Victim #2 because of Victim #2's actual and perceived sexual

orientation and gender identity; and that in connection with this offense, the defendant employed a firearm that had travelled in interstate commerce, and used a channel, facility and instrumentality of interstate commerce. This act included kidnapping.

In violation of 18 U.S.C. § 249(a)(2).

COUNT FIVE
Kidnapping
(18 U.S.C. § 1201(a)(1))

On or about September 1, 2022, in the Southern District of Texas and within the jurisdiction of the Court, the Defendant,

SALIH ALI MOHAMMED ALHEMOUD,

did unlawfully and willfully seize, confine, inveigle, and hold Victim #2 for reward and benefit, and in committing and in furtherance of the commission of the offense, used Grindr, a social networking internet application, and a Glock 17, 9-millimeter firearm, serial number BVZZ495, a means, facility, and instrumentality of interstate and foreign commerce.

In violation of 18 U.S.C. § 1201(a)(1).

COUNT SIX
Brandishing a Firearm During and in Relation to a Crime of Violence
(18 U.S.C. § 924(c)(1)(A))

On or about September 1, 2022, in the Southern District of Texas and within the jurisdiction of the Court, the Defendant,

SALIH ALI MOHAMMED ALHEMOUD,

did knowingly brandish, carry and use a firearm, that is, a Glock 17, 9-millimeter firearm, serial number BVZZ495, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, a hate crime as charged in Count Four of this Indictment, in

violation of 18 U.S.C. § 249, and kidnapping as charged in Count Five of this Indictment, in violation of 18 U.S.C. § 1201(a)(1).

In violation of 18 U.S.C. § 924(c)(1)(A).

NOTICE OF FORFEITURE
(18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice that upon conviction of Count Three or Count Six, all firearms and ammunition involved in, or used in any knowing violation of section 924, is subject to forfeiture to the United States, including but not limited to the following:

a Glock 17, 9mm, serial number BVZZ495.

A TRUE BILL

Original Signature on File

GRAND JURY FOREPERSON

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United States Attorney

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